

EXHIBIT “B”

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

ANNE MARIE HUNTER,

Plaintiff,

v.

DURR SYSTEMS, INC.,

Defendant.

CASE NO.: 2:06-cv-0411-SRW

AFFIDAVIT OF SCOTT MATTHEW WAGNER

STATE OF MICHIGAN)

COUNTY OF WAYNE)

Scott Matthew Wagner gives this testimony after being duly sworn:

1. My name is Scott Matthew Wagner. I am over the age of nineteen (19) years, of sound mind, and I give this testimony based on my personal knowledge.
2. I am employed as a Corporate Safety Officer at Durr Systems, Inc. I am one of the custodians of certain records relating to Anne Marie Hunter's fall at the Hyundai facility in Montgomery, Alabama, on or about January 26, 2005. One of these records is attached to my Affidavit as Attachment "1", which is a true and correct copy of an engineering drawing of the grate that was missing on the date of Ms. Hunter's fall.

3. Durr Systems, Inc. maintains this document in the usual and ordinary course of its business, and it relies upon this document and others like it in the usual and ordinary course of its business.

4. The grate that was missing on the date of Ms. Hunter's fall was five feet (5') long (1,524 mm), two feet one and nine-sixteenths inches (2' 1-9/16") wide (650 mm), and one and a quarter inches (1 1/4") high (30 mm).

5. Attachments "2", "3", and "4" to my affidavit are true and correct copies of photographs that fairly and accurately depict the paint booth in which Anne Marie Hunter fell.

Further Affiant sayeth not.


Affiant

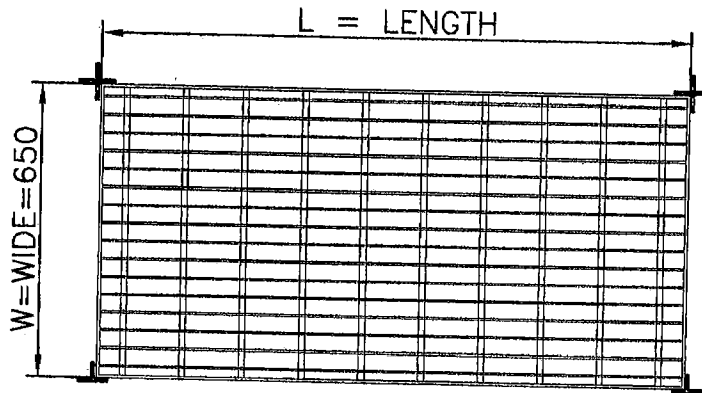
Subscribed and sworn to before me this
1st day of March, 2007.


Notary Public

My Commission Expires: 11-17-2007

JENNIFER S. FORTIN
Notary Public, Wayne County, MI
My Commission Expires Nov. 17, 2007

ATTACHMENT “1”



1 1/4" x 3/16"
Type 30W4
Smooth Steel Bar
Grating, Banded,
Painted Black

GRATINGS :

WIDTH: 650 [mm] ; 2'-1 9/16"

HIGHT: 30 [mm] ; 1-1/4"

LENGTH: 1524 [mm] ; 5'-0"

Conveyor No	PC0682	65 pcs.
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Conveyor No	PC1062	35 pcs.
Conveyor No	PC1096	35 pcs.

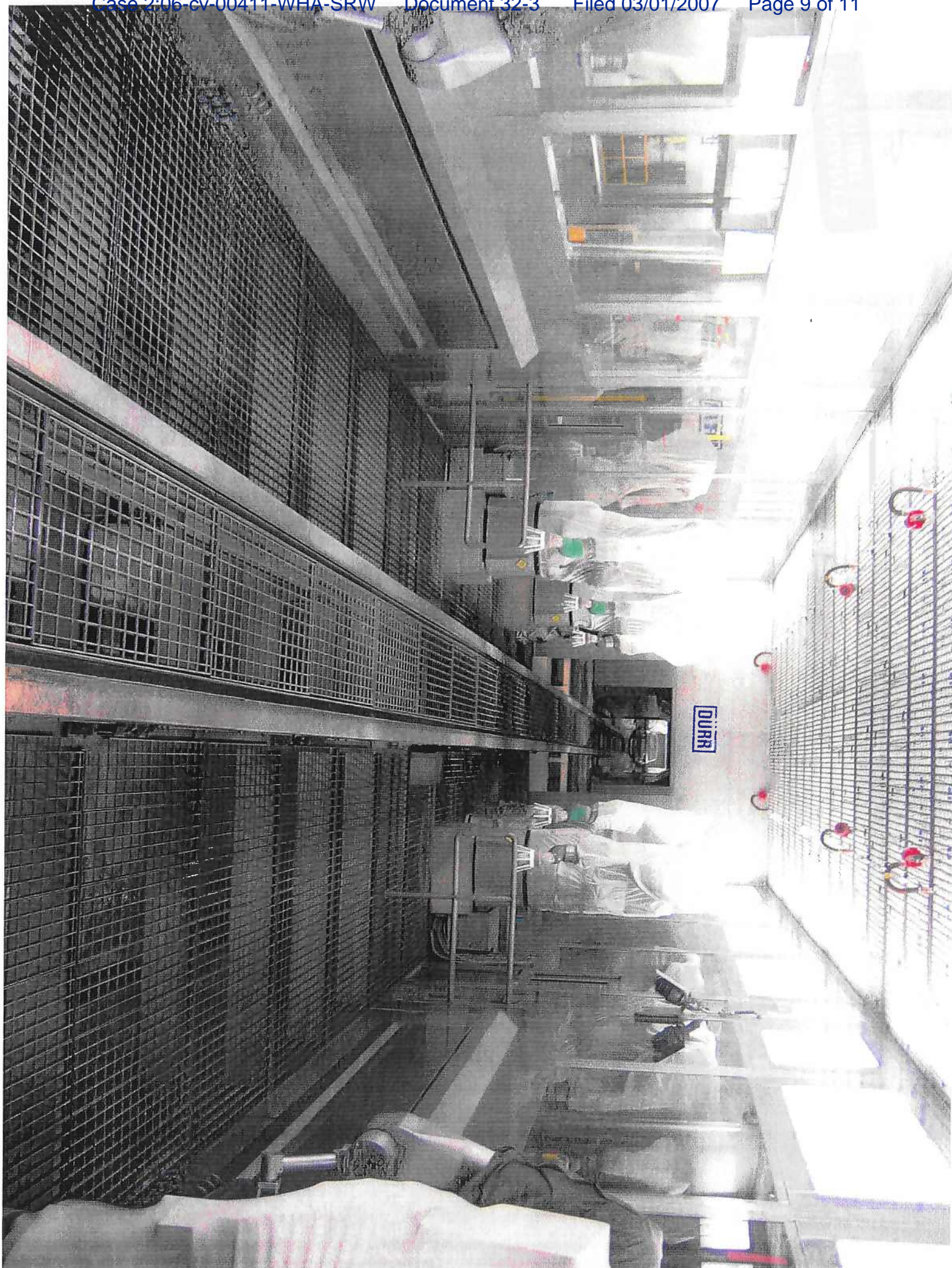
			Notice:
Conveyor No	PC1064	24 pcs.	The lenghts are counted without lenght of gratings in heated flash
Conveyor No	PC1098	24 pcs.	

LENGTH TOLLERANCE: -1 [mm] ; -3/64"

ATTACHMENT “2”



ATTACHMENT “3”



ATTACHMENT “4”

